Warner-Lambert Company
201 Tabor Road
Morris Plains, New Jersey 07950
973540-6710
Fax: 973540-2558
E-Mail: longd@mops.wl.com

David J. Long
Vice President and Associate General Counsel,
Regulatory and Governmental Affairs

WARNER LAMBERT

February 19, 1999

Dockets Management Branch (HFA-305)
Food & Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

RE: Docket No. 98 N-0148

Gentlemen:

Warner-Lambert Company ("Warner") is the manufacturer of over thirty-five separate cough/cold products containing pseudoephedrine, mostly marketed under the Sudafed® and Actifed® names. Warner has followed the development of the recommendation by the World Health Organization ("WHO") to schedule 1-ephedrine and d, 1 -ephedrine under article 2 of the Convention of Psychotropic Substances of 1971. For the reasons set forth in the submission of the Nonprescription Drug Manufacturers Association to this docket, Warner believes the WHO recommendation is erroneous and ought to be rejected. Warner is particularly concerned with the apparent lack of due process and transparency at the June 1998 meeting of the WHO Expert Committee. Warner believes that FDA should take steps to attempt to correct the deficiencies in WHO procedures similar to those at the June 1998 meeting, as outlined in the NDMA submission.

Thank you for the opportunity to submit comments.

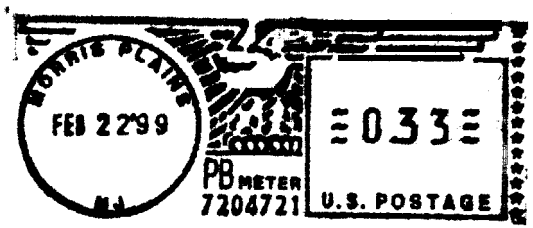
Very truly yours,

David J. Long

98N-0148

C35

Warner-Lambert Company
201 Tabor Road
Morris Plains, New Jersey 07950



WARNER LAMBERT

Dockets Management Branch (HFA-305)
Food & Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

E15G

20457-0001